

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

In the Matter of:
Etna Post Office
Etna, New York

Docket No. A2011-61

UNITED STATES POSTAL SERVICE
COMMENTS REGARDING APPEAL
(October 27, 2011)

On August 29, 2011, the Postal Regulatory Commission (Commission) received an appeal postmarked August 24, 2011, from postal customer Heather Marshall, objecting to the discontinuance of the Post Office at Etna, New York. On September 8, 2011, the Commission issued Order No. 842, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S.C. § 404(d). The Commission subsequently received petitions objecting to the discontinuance of the Etna Post Office from Tony Lednor, the Etna Community Association, Judith A. Auble-Zazzara, and Sharon J. Searles.¹ The Etna Community Association and Sharon J. Searles each filed a Form 61 in support of their petitions. In accordance with Order No. 842, the Postal Service filed the administrative record with the Commission on September 19, 2011.

The appeals received by the Commission raise three main issues: (1) the effect on postal services, (2) the impact upon the Etna community, and (3) the calculation of economic savings expected to result from discontinuing the Etna Post Office. As reflected in the administrative record of this proceeding, the Postal Service gave these issues serious consideration. In addition, consistent with the Postal Service's statutory

¹ All of the parties who filed petitions are referred to herein collectively as the "Petitioners."

obligations and Commission precedent,² the Postal Service gave consideration to a number of other issues, including the impact upon postal employees. Accordingly, the determination to discontinue the Etna Post Office should be affirmed.

Background

The Final Determination To Close the Etna, NY Post Office and Establish Service by Rural Route Service (FD), as well as the administrative record, indicate that the Etna Post Office provides EAS-11 level service to 156 Post Office Box or general delivery customers, and retail customers, 43.75 hours per week. FD at 2. The postmaster of the Etna Post Office retired on July 30, 2010. Since then, a noncareer temporary officer-in-charge (OIC) has been installed to operate the office. Upon implementation of the final determination, the noncareer OIC may be reassigned to a nearby facility or separated from the Postal Service. FD at 11.

The average number of daily retail window transactions at the Etna Post Office is fifty-nine. Revenue over the last three years was: \$79,126 in FY 2008; \$76,657 in FY 2009; and \$68,146 in FY 2010. FD at 2. The Etna Post Office has three meter or permit customers. FD at 11.

Upon implementation of the final determination, delivery and retail services will be provided by rural route delivery administered by the Freeville Post Office, an EAS-18 level office located three miles away, which has 182 available Post Office Boxes. FD at 2.

² See 39 U.S.C. 404(d)(2)(A).

The Postal Service followed the proper procedures which led to the posting of the FD. All issues raised by the customers of the Etna Post Office were considered and properly addressed by the Postal Service. The Postal Service complied with all notice requirements. In addition to the posting of the Proposal and FD, customers received notice through other means. Questionnaires were distributed to delivery customers of the Etna Post Office. Questionnaires were also available over the counter for retail customers at Etna. FD at 2. Fifty-nine customer questionnaires were returned. The returned customer questionnaires and Postal Service response letters appear in the administrative record in Item No. 22. In addition, representatives from the Postal Service were available at the Etna Post Office for a community meeting on May 5, 2011, to answer questions and provide information to customers. FD at 2. Customers received formal notice of the Proposal and FD through postings at the Etna Post Office and the Freeville Post Office. The Proposal was posted with an invitation for public comment from May 21, 2011 to July 22, 2011. FD, at 2. The FD was posted at the same two Post Offices starting on August 23, 2011, as confirmed by the round-dated FD cover sheets that appear in the administrative record.

In light of the postmaster vacancy, light workload, low office revenue, the variety of delivery and retail options (including the convenience of rural delivery and retail service),³ absence of any other storefront businesses in the area,⁴ minimal impact upon the community, and the expected financial savings,⁵ the Postal Service issued the FD.

³ FD at 4.

⁴ FD at 9.

⁵ FD at 10.

Regular and effective postal services will continue to be provided to the Etna community in a cost-effective manner upon implementation of the final determination. FD at 1.

Each of the issues raised by the Petitioner is addressed in the paragraphs which follow.

Effect on Postal Services

Consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iii) and as addressed throughout the administrative record, the Postal Service considered the effect of closing the Etna Post Office on postal services provided to Etna customers. The closing is premised upon providing regular and effective postal services to Etna customers.

The Petitioners raise the issue of the effect on postal services of the Etna Post Office's closing, noting the convenience of the Etna Post Office and requesting its retention. The Petitioners express particular concern about the proximity of the Post Office to certain customers and the effect of the closing on local businesses for whom the Etna Post Office is the most conveniently located Post Office. Each of these concerns was considered by the Postal Service.

The Postal Service has considered the impact of closing the Etna Post Office upon the provision of postal services to Etna customers. While it would be ideal for all customers to be within walking distance of a post office, this is not possible for most postal customers. For customers and businesses who have access to transportation, the Freeville Post Office is within three miles of the Etna Post Office. For customers who are disabled or who do not have access to transportation, rural route delivery provides similar access to retail service, and in hardship cases, delivery can be made to

the home of the customer. FD at 5. Thus, the Postal Service has properly concluded that all Etna customers will continue to receive regular and effective service.

Effect Upon the Etna Community

The Postal Service is obligated to consider the effect of its decision to close the Etna Post Office upon the Etna community. 39 U.S.C. § 404(d)(2)(A)(i). While the primary purpose of the Postal Service is to provide postal services, the statute recognizes the substantial role in community affairs often played by local Post Offices, and requires consideration of that role whenever the Postal Service proposes to close or consolidate a Post Office.

The Petitioners raise the issue of the effect of the closing of the Etna Post Office upon the Etna community. This issue was extensively considered by the Postal Service, as reflected in the administrative record. FD, at 4-8. Communities generally require regular and effective postal services and these will continue to be provided to the Etna community. The availability of the Freeville Post Office and the provision of carrier service is expected to be able to adequately serve the community. Further, the Postal Service will help preserve the Etna community's historical dimension by continuing to use the name in addresses. The fact that the community center in which the Etna Post Office is located will continue to house a number of organizations means that the center can continue to serve as a gathering place for Etna community members.

Thus, the Postal Service has met its burden, as set forth in 39 U.S.C. § 404(d)(2)(A)(i), by considering the effect of closing the Etna Post Office on the community served by the Etna Post Office.

Economic Savings

Postal officials also properly considered the economic savings that would result from the proposed closing, as provided under 39 U.S.C. § 404(d)(2)(A)(iv). The Postal Service estimates that rural route carrier service would cost the Postal Service substantially less than maintaining the Etna Post Office and would still provide regular and effective service. FD at 10. The estimated annual savings associated with discontinuing the Etna Post Office are \$29,336. FD at 10.

The Petitioners state that the Etna Post Office outperforms some other small offices and therefore it should not be closed. While the economic savings that would result from closing the Etna Post Office are significant, economic savings is only one of several factors that the Postal Service considered. Economic savings have been calculated as required for discontinuance studies, which is noted throughout the administrative record, consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iv).

The Postal Service determined that carrier service is more cost-effective than maintaining the Etna postal facility and postmaster position. FD at 6. The Postal Service's estimates are supported by record evidence, in accordance with the Postal Service's statutory obligations. The Postal Service, therefore, has considered the economic savings to the Postal Service resulting from such a closing, consistent with its statutory obligations and Commission precedent. See 39 U.S.C. § 404(d)(2)(A)(iv).

Effect on Employees

As documented in the record, the impact on postal employees is minimal. The postmaster retired on July 30, 2010. Since then, a noncareer temporary officer-in-charge (OIC) has been installed to operate the office. Upon implementation of the final determination, the noncareer OIC may be reassigned to a nearby facility or separated from the Postal Service. FD at 11. The record shows that no other employee would be affected by this closing. Therefore, in making the determination, the Postal Service considered the effect of the closing on the employees at the Etna Post Office, consistent with its statutory obligations. See 39 U.S.C. § 404(d)(2)(A)(ii).

Conclusion

As reflected throughout the administrative record, the Postal Service has followed the proper procedures and carefully considered the effect of closing the Etna Post Office on the provision of postal services and on the Etna community, as well as the economic savings that would result from the proposed closing, the effect on postal employees, and other factors, consistent with the mandate of 39 U.S.C. § 404(d)(2)(A).

After taking all factors into consideration, the Postal Service determined that the advantages of discontinuance outweigh the disadvantages. In addition, the Postal Service concluded that after the discontinuance, the Postal Service will continue to provide effective and regular service to Etna customers. The Postal Service respectfully submits that this conclusion is consistent with and supported by the administrative record and is in accord with the policies stated in 39 U.S.C. § 404(d)(2)(A). The Postal Service's decision to close the Etna Post Office should, accordingly, be affirmed.

The Postal Service respectfully requests that the determination to close the Etna Post Office be affirmed.

Respectfully submitted,

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